

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

RICHARD T. MAGLIOCCA

Plaintiff,

vs.

AUTO GALLERY IMPORTS; THE
GUARDIAN WARRANTY CORPORATION;
THE CREDIT UNION LOAN SOURCE,
LLC; QUANTUM AUTO GROUP, LLC;
"NCB, FSB" aka "NCB SAVINGS BANK,
FSB"

Defendants.

**ADMISSION TO PRACTICE
PRO HAC VICE**

**CIVIL ACTION NO.: CV-09-766
(SJF)(AKT)**

The motion for admission to practice pro hac vice in the above captioned matter is granted. The admitted attorney Kevin M. McKeon is permitted to argue or try this particular case in whole or in part as counsel or advocate for defendant, Guardian Warranty Corporation ("GWC").

An attorney admitted to practice pro hac vice is required to pay a \$25.00 attorney admission fee and present this Order to the intake deputy clerk in the Clerk's Office. When paying by mail, return a copy of this Order to the Clerk's Office with the required fee.

This Order confirms your appearance as counsel in this case, and it will be entered on the Court's docket. A notation of your admission pro hac vice for the above listed case will be made on the roll of attorneys.

The attorney admitted pro hac vice must serve a copy of this Order on all other counsel in this case.

Date:

United States District Judge

cc: Kevin McKeon
Pro Hac Vice Attorney
Marshall, Dennehey, Warner, Coleman & Goggin
Woodland Hills Corporate Park, Suite 300
200 Lake Drive East
Cherry Hill, New Jersey 08002

Court File (Civil Action No.: CV-09-766)

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Defendants.

**NOTICE OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

**CIVIL ACTION NO. CV-09-766
(SJF)(AKT)**

To: Daniel A. Schlanger, Esq.
Schlanger & Schlanger, LLP
1025 Westchester Avenue, Suite 108
White Plains, NY 10604
Attorney for Plaintiff
E-Mail: Daniel@schlangerlegal.com

Todd E. Hennings, Esq.
Macey, Wilensky, Kessler & Hennings
230 Peachtree Street
27th Floor, Suite 2700
Atlanta GA 30303
E-Mail: thennings@maceylaw.com

Peter D. St. Phillip, Jr.
Lowey, Dannenberg, Cohen & Hart, P.C.
One North Broadway, 5th Floor
White Plains, NY 10601
Attorneys for Defendant, NCB, FSB
E-Mail: pstphillip@lowey.com

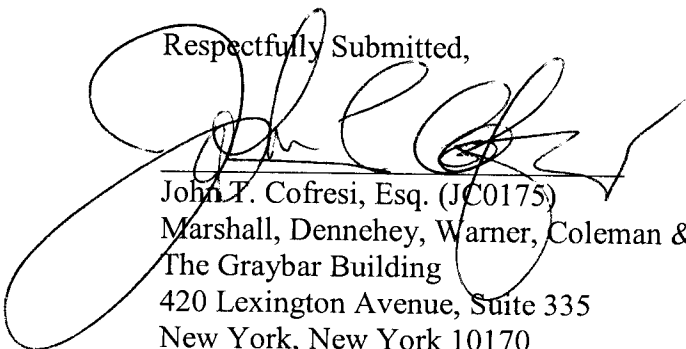
Craig Feldherr, Esq.
Feldherr & Feldherr
900 Merchants Concourse, Suite 305
Westbury, NY 11590
E-Mail: craig@feldherrlaw.com

PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion, the affidavit of Kevin M. McKeon, and the Certificate(s) of Good Standing annexed thereto we will move this Court before the Honorable Sandra J. Feuerstein at the United States Courthouse for the Eastern District of New York, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an Order allowing the admission of Kevin M. McKeon, Esq., a shareholder of the firm of Marshall,

Dennehey, Warner, Coleman & Goggin, and a member in good standing of the Bar of the States of New Jersey and Pennsylvania, as attorney pro hac vice to argue or try this case in whole or in part as counsel for defendant, Guardian Warranty Corporation. There are no pending disciplinary proceedings against Kevin M. McKeon, Esq. or the undersigned in any State or Federal Court.

Dated: New York, New York
July 20, 2009

Respectfully Submitted,

A large, stylized handwritten signature in black ink, likely belonging to John T. Cofresi, is written over the typed name and address.

John T. Cofresi, Esq. (JC0175)
Marshall, Dennehey, Warner, Coleman & Goggin
The Graybar Building
420 Lexington Avenue, Suite 335
New York, New York 10170
Attorneys for Defendant,
Guardian Warranty Corporation

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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Plaintiff,

vs.

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FSB"

Defendants.

AFFIDAVIT OF MOVANT
IN SUPPORT OF MOTION
TO ADMIT COUNSEL PRO HAC VICE

CIVIL ACTION NO. CV-09-766
(SJF)(AKT)

State of New York)
)
County of New York) ss:

John T. Cofresi, being duly sworn, hereby deposes and says as follows:

1. I am associated with the law firm Marshall, Dennehey, Warner, Coleman & Goggin, counsel to defendant, Guardian Warranty Corporation ("Guardian"), in the above-styled cause. I am familiar with the proceedings in this case. I make this statement from my own personal knowledge of the facts set forth herein and in support of the instant motion to admit Kevin M. McKeon, Esq. to practice pro hac vice in the above-styled cause.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law by the Appellate Division of the Supreme Court of the State of New York, First Department in April 2005. I am also admitted to the bar of the United States District Court for the Eastern District of New York, and am in good standing with this Court.

3. I have known Kevin M. McKeon, Esq. since March of 2009. Mr. McKeon is a shareholder at Marshall, Dennehey, Warner, Coleman & Goggin.

4. I have found Mr. McKeon to be a skilled attorney and a person of integrity. He is experienced in Federal Practice and is familiar with the Federal Rules of Civil Procedure.

5. As evidenced by the affidavit of Mr. McKeon annexed hereto, he has represented Guardian Warranty Corporation for over 5 years in proceedings brought in the state and federal courts of Pennsylvania and New Jersey. He has served as of-counsel to Guardian in litigation throughout the United States.

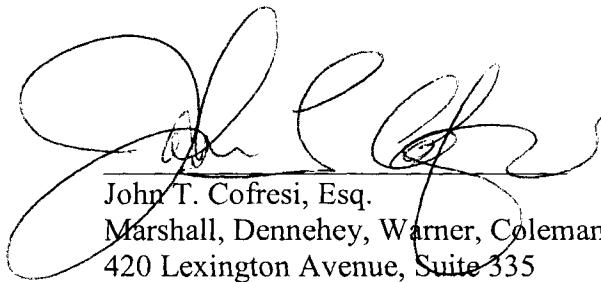
6. I have contacted Schlanger & Schlanger, attorneys for plaintiff, and Lowey, Dannenberg, Cohen & Hart P.C., attorneys for defendant, NCB, FSB, about the instant application. I am informed that neither party intends to oppose the instant application.

7. Accordingly, I am pleased to move the admission of Kevin M. McKeon, Esq. to practice before this Honorable Court pro hac vice.

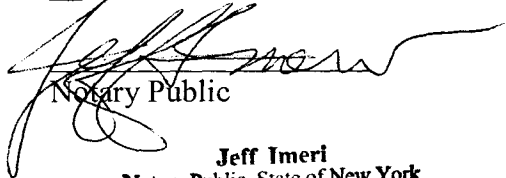
8. I respectfully submit a proposed order granting the admission of Kevin M. McKeon, Esq. pro hac vice.

WHEREFORE, it is respectfully requested that the motion to admit Kevin M. McKeon, Esq. pro hac vice, to represent defendant, Guardian Warranty Corporation, in the above-styled cause be granted.

Date: New York, New York
July 20, 2009


John T. Cofresi, Esq.
Marshall, Dennehey, Warner, Coleman & Goggin
420 Lexington Avenue, Suite 335
New York, New York 10170
Attorneys for Defendant,
Guardian Warranty Corporation

Sworn to me this
__ day of July 2009


Notary Public

Jeff Imeri
Notary Public, State of New York
NO. 021M6143321
Qualified in Suffolk County
Commission Expires April 3, 2010

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

RICHARD T. MAGLIOCCA

Plaintiff,

vs.

AUTO GALLERY IMPORTS; THE
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Defendants.

**AFFIDAVIT OF MOVANT
IN SUPPORT OF MOTION
TO ADMIT COUNSEL PRO HAC VICE**

**CIVIL ACTION NO. CV-09-766
(SJF)(AKT)**

State of New Jersey)
) ss:
County of Camden)

Kevin M. Mckeon, being duly sworn, hereby deposes and says as follows:

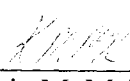
1. I am a shareholder with the law firm Marshall, Dennehey, Warner, Coleman & Goggin.
2. I submit this affidavit in support of my motion for admission to practice pro hac vice in the above captioned matter.
3. As shown in the Certificates of Good Standing annexed hereto as Exhibit "A" I am a member in good standing of the Bar of the State of New Jersey and Commonwealth of Pennsylvania.
4. I am admitted to the United States District Courts for the districts of New Jersey, Eastern District of Pennsylvania and the Middle District of Pennsylvania, the Third Circuit Court of Appeals and the United States Supreme Court.

5. There are no pending disciplinary proceedings against me in any State or Federal Court.

6. I have represented Guardian Warranty Corporation for over 5 years throughout the state and federal courts in Pennsylvania and New Jersey and have served of counsel to Guardian in litigation throughout the United States. I have extensive familiarity with Guardian and Guardian has requested that I assist in representing it in this matter.

7. My office has been in contact with Schlanger & Schlanger, attorneys for plaintiff, and Lowey, Dannenberg, Cohen & Hart P.C., attorneys for defendant, NCB, FSB, about the instant application. I am informed that neither party intends to oppose the instant application.

8. Wherefore your affiant respectfully submits that he be permitted to appear as counsel and advocate pro hac vice in this once case for defendant, Guardian Warranty Corporation.



Kevin M. McKeon, Esq.
Marshall, Dennehey, Warner, Coleman & Goggin
Woodland Hills Corporate Park, Suite 300
200 Lake Drive East
Cherry Hill, New Jersey 08002
Attorneys for Defendant,
Guardian Warranty Corporation

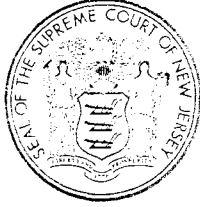
Dated: 6/26/09

NOTARIZE



DOREEN J. MANSILLA
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES JULY 21, 2009

Supreme Court of New Jersey

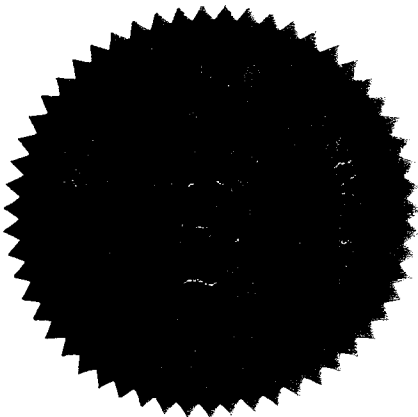


Certificate of Good Standing

This is to certify that **KEVIN M MC KEON**
(No. **035351986**) *was constituted and appointed an Attorney at Law of New Jersey on* **December 22, 1986** *and, as such, has been admitted to practice before the Supreme Court and all other courts of this State as an Attorney at Law, according to its laws, rules, and customs.*

I further certify that as of this date, the above-named is an Attorney at Law in Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if the Court's records reflect that the attorney: 1) is current with all assessments imposed as a part of the filing of the annual Attorney Registration Statement, including, but not limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-12.

Please note that this Certificate does not constitute confirmation of an attorney's satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice law in this State.



*In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this*

23RD day of **June**, 20 **09**.

Clerk of the Supreme Court



Supreme Court of Pennsylvania

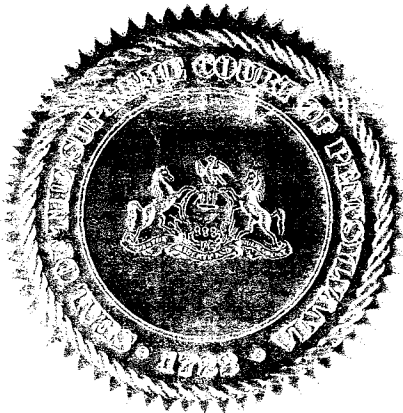
CERTIFICATE OF GOOD STANDING

Kevin Mark McKeon, Esq.

DATE OF ADMISSION

November 6, 1986

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: June 23, 2009

Patricia A. Johnson

Patricia A. Johnson
Chief Clerk

**UNITED STATES DISTRICT COURT
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Civil Index No.:CV-09-766 (SJF) (AKT)

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Defendants.

ADMISSION TO PRACTICE PRO HAC VICE

MARSHALL, DENNEHEY, WARNER, COLEMAN & GOGGIN

Attorneys for Defendant, GUARDIAN WARRANTY CORPORATION.

ENTERPRISE RECOVERY SYSTEMS, INC.

The Graybar Building,
420 Lexington Avenue, Suite 335
New York, New York 10170
(212) 878-1700